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Attorneys for Plaintiff James Truhe

**IN THE U.S. DISTRICT COURT
DISTRICT OF NEVADA**

JAMES TRUHE, an individual,

Plaintiff,

v.

GARY S. LEE, an individual,

Defendant.

Case No. 2:14-cv-00457-JAD-GWF

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND PLAINTIFF
JAMES TRUHE'S TIME TO ANSWER
OR OTHERWISE RESPOND TO
DEFENDANT'S COUNTERCLAIMS
(FIRST REQUEST)**

Plaintiff James Truhe ("Plaintiff") and Defendant Gary S. Lee ("Defendant"), by and through their counsel of record, do hereby stipulate and agree to continue Plaintiff James Truhe's time to answer or otherwise respond to Defendant's counterclaims. Plaintiff began this action by filing his Complaint against Defendant on March 27, 2014, and he served Defendant by publication between June 4, 2014, and June 25, 2014. *See* ECF Doc. Nos. 1 and 8. Defendant responded by filing a Motion to Dismiss, which the Court denied on January 14, 2015. *See* ECF Doc. Nos. 10 and 29. Defendant then filed an answer and asserted counterclaims against Plaintiff on February 11, 2015. *See* ECF Doc. No. 32. Pursuant to Rules 5, 6, and 12 of the Federal Rules of Civil Procedure, Plaintiff's answer or other responsive document is due on March 9, 2015.

Plaintiff and Defendant have reached a settlement in principle on this matter. While they

draft and finalize the settlement documents, Plaintiff and Defendant request that Court extend the time for Plaintiff to answer or otherwise respond to Defendant's counterclaims to March 23, 2015. Although Plaintiff and Defendant do not believe an answer or other responsive document will be needed, they request this extension out of an abundance of caution should finalizing the settlement documents take longer than they anticipate.

RESPECTFULLY SUBMITTED on March 6, 2015.

McDONALD CARANO WILSON LLP

MICHAEL B. LEE, P.C.

/s/ Rory T. Kay

/s/ Michael B. Lee

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Attorney for Defendant Gary S. Lee

IT IS SO ORDERED:



GEORGE FOLEY, JR.
United States Magistrate Judge

DATED: March 9, 2015

SUBMITTED BY:

McDONALD CARANO WILSON LLP

/s/ Rory T. Kay

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